

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	: DATE FILED:
v.	: CRIMINAL NO. 03-
TYWANNA CURRIE-MILLER	: VIOLATIONS: 18 U.S.C. § 1029(b)(2) (Conspiracy to commit credit card fraud - 1 count) 18 U.S.C. § 1029(a)(2) (Unauthorized use of access devices - 11 counts) 18 U.S.C. § 2 (Aiding and abetting) 18 U.S.C. § 982 (Criminal forfeiture)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this Indictment:

1. The Chase Manhattan Bank, N.A. (Chase), was a national bank which issues credit cards to individual and commercial account holders.
2. Chase forwarded credit cards to its account holders through the United States Mail.
3. Chase maintained a post office box in Wilmington, Delaware for the return of credit cards which were determined to be undeliverable by mail to its account holders through the United States Mail.
4. The United States Postal Service, Delaware Plant & Distribution Center in Wilmington, Delaware, processed mail for the general public and commercial entities, including

Chase, and was responsible for the placement of undelivered mail into Chase's post office box.

5. Defendant TYWANNA CURRIE-MILLER was employed by the United States Postal Service at the Delaware Plant & Distribution Center, where she handled mail addressed to Chase's post office box used for the return of undelivered credit cards.

6. Between on or about February 1, 1999 and on or about November 13, 2000, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

conspired and agreed with Paul J. Newman and others unknown to the grand jury to knowingly and with intent to defraud commit credit card fraud, in violation of Title 18, United States Code, Section 1029(a)(2).

MANNER AND MEANS

7. Defendant TYWANNA CURRIE-MILLER stole from the United States Mail approximately 186 Chase credit cards which were not delivered to the true account holders and should have been returned to Chase as undeliverable.

8. Defendant TYWANNA CURRIE-MILLER sold stolen credit cards to Paul J. Newman, charged elsewhere.

9. Paul J. Newman and others unknown to the grand jury used the stolen credit cards to make purchases of goods, services and other things of value aggregating approximately \$599,303.69.

10. Prior to using the credit cards, Paul J. Newman placed calls to a number at Chase to check available credit on the cards. These calls were made from telephone numbers 215-564-9926 and 215-564-9804, numbers assigned to public telephones located on the first floor

of the Philadelphia Municipal Services Building, 1417 John F. Kennedy Boulevard, Philadelphia, Pennsylvania, where Newman worked as an employee of the City of Philadelphia, Pennsylvania.

OVERT ACTS

In furtherance of the conspiracy TYWANNA CURRIE-MILLER, Paul J. Newman and others unknown to the grand jury committed the following overt acts, among others, in the Eastern District of Pennsylvania and elsewhere:

1. On or about October 25, 1999, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 7347 from the United States Mail and provided it to Paul J. Newman.

2. Between on or about October 25, 1999, and on or about January 3, 2000, Paul J. Newman placed and caused approximately 17 telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 7347.

3. Between on or about October 27, 1999, and on or about January 28, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 7347 to purchase goods, services and other things of value totaling approximately \$6,070.81.

4. On or about November 7, 1999, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 8171 from the United States Mail and provided it to Paul J. Newman.

5. Between on or about November 9, 1999, and on or about December 23, 1999, Paul J. Newman placed and caused approximately 18 telephone calls to be placed to

Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 8171.

6. Between on or about November 9, 1999, and on or about December 23, 1999, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 8171 to purchase goods, services and other things of value totaling approximately \$7,914.28.

7. On or about May 5, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 4336 from the United States Mail and provided it to Paul J. Newman.

8. Between on or about May 5, 2000, and on or about June 27, 2000, Paul J. Newman placed and caused approximately seven telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 4336.

9. Between on or about May 12, 2000, and on or about June 13, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 4336 to purchase goods, services and other things of value totaling approximately \$4,509.69.

10. On or about May 10, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 2457 from the United States Mail and provided it to Paul J. Newman.

11. Between on or about May 10, 2000, and on or about June 19, 2000, Paul J. Newman placed and caused approximately 12 telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits

2457.

12. Between on or about May 15, 2000, and on or about June 19, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 2457 to purchase goods, services and other things of value totaling approximately \$6,999.04.

13. On or about May 10, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 4675 from the United States Mail and provided it to Paul J. Newman.

14. Between on or about May 10, 2000, and on or about August 17, 2000, Paul J. Newman placed and caused approximately 15 telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 4675.

15. Between on or about May 15, 2000, and on or about July 8, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 4675 to purchase goods, services and other things of value totaling approximately \$8,455.37.

16. On or about May 10, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 2249 from the United States Mail and provided it to Paul J. Newman.

17. Between on or about May 10, 2000, and on or about June 8, 2000, Paul J. Newman placed and caused approximately 17 telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 2249.

18. Between on or about May 18, 2000, and on or about June 14, 2000, Paul J.

Newman used and caused the use of the credit card which bore a number ending in the digits 2249 to purchase goods, services and other things of value totaling approximately \$4,482.71.

19. On or about May 10, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 4086 from the United States Mail and provided it to Paul J. Newman.

20. Between on or about May 10, 2000, and on or about May 31, 2000, Paul J. Newman placed and caused approximately two telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 4086.

21. Between on or about June 3, 2000, and on or about June 27, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 4086 to purchase goods, services and other things of value totaling approximately \$1,458.68.

22. On or about May 24, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 4263 from the United States Mail and provided it to Paul J. Newman.

23. Between on or about May 24, 2000, and on or about June 27, 2000, Paul J. Newman placed and caused approximately four telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 4263.

24. Between on or about May 24, 2000, and on or about June 26, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 4263 to purchase goods, services and other things of value totaling approximately \$4,452.34.

25. On or about June 6, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 3156 from the United States Mail and provided it to Paul J. Newman.

26. Between on or about June 6, 2000, and on or about June 27, 2000, Paul J. Newman placed and caused approximately three telephone calls to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 3156.

27. Between on or about June 6, 2000, and on or about July 19, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 3156 to purchase goods, services and other things of value totaling approximately \$3,203.46.

28. On or about June 30, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 2270 from the United States Mail and provided it to Paul J. Newman.

29. On or about July 6, 2000, Paul J. Newman placed and caused a telephone call to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 2270.

30. Between on or about June 30, 2000, and on or about July 28, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 2270 to purchase goods, services and other things of value totaling approximately \$4,455.98.

31. On or about July 13, 2000, defendant TYWANNA CURRIE-MILLER stole a Chase credit card which bore a number ending in the digits 3465 from the United States Mail and provided it to Paul J. Newman.

32. On or about July 24, 2000, Paul J. Newman placed and caused a telephone call to be placed to Chase's VRU to check the available credit for the credit card account which bore a number ending in the digits 3465.

33. Between on or about July 13, 2000, and July 25, 2000, Paul J. Newman used and caused the use of the credit card which bore a number ending in the digits 3465 to purchase goods, services and other things of value totaling approximately \$2,552.98.

In violation of Title 18, United States Code, Section 1029(b)(2).

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 7347, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$6,070.81, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
10/27/99	Target	North Wales, PA	\$847.96
10/30/99	Neiman Marcus	Philadelphia, PA	\$280.30
11/30/99	Amtrak	Philadelphia, PA	\$107.00
12/1/99	K-Mart	Claymont, DE	\$499.96
12/7/99	Bernini's	Las Vegas, NV	\$429.00
12/10/99	Home Depot	Fairless Hills, PA	\$613.74
12/11/99	Philadelphia 76ers	212-307-7171	\$228.40
12/15/99	Target	Springfield, PA	\$364.59
12/17/99	Home Depot	Montgomeryville, PA	\$793.94
12/18/99	Footlocker	Philadelphia, PA	\$450.00
12/19/99	Outback	Jenkintown, PA	\$59.16

12/21/99	Bachrach	King of Prussia, PA	\$130.00
12/22/99	American Appliance	Wilmington, DE	\$787.95
12/24/99	Footlocker	Philadelphia, PA	\$449.97
1/28/00	Paris La Menagerie	Las Vegas, NV	\$257.24

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 8171, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$7,914.28, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
11/9/99	Best Buy	Fairless Hills, PA	\$1314.37
11/13/99	Hilton	Atlantic City, NJ	\$300.00
11/22/99	Best Buy	Deptford, NJ	\$1059.98
11/27/99	Home Depot	Woodbridge, NJ	\$793.94
12/1/99	Home Depot	Claymont, DE	\$277.00
12/4/99	Louis Vuitton	Las Vegas, NV	\$1034.96
12/10/99	K-Mart	Langhorne, PA	\$265.10
12/11/99	Exxon	Philadelphia, PA	\$21.66
12/14/99	Best Buy	Deptford, NJ	\$1128.83
12/15/99	Footlocker	Philadelphia, PA	\$267.99
12/17/99	Mobil Oil	North Wales, PA	\$10.02

12/18/99	Amtrak	Philadelphia, PA	\$228.00
12/21/99	Footlocker	Philadelphia, PA	\$397.47
12/22/99	K-Mart	Wilmington, DE	\$799.96
12/23/99	Center City Car Wash	Philadelphia, PA	\$15.00

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

PAUL J. NEWMAN

knowingly and with intent to defraud, used and aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 4336, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$4,509.69, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
5/12/00	Hecht's	Wilmington, DE	\$73.62
5/12/00	Hecht's	Wilmington, DE	\$149.95
5/18/00	Sam Ash Music	New York, NY	\$2,543.99
5/28/00	Pizzeria Uno	King of Prussia, PA	\$50.31
5/29/00	Amoco	Philadelphia, PA	\$19.14
6/1/00	Septa	Philadelphia, PA	\$64.00
6/1/00	Penn Center Beauty Supply	Philadelphia, PA	\$31.00
6/2/00	K-Mart	Deptford, PA	\$466.38
6/2/00	Amoco	Philadelphia, PA	\$15.00
6/9/00	K-Mart	Wilmington, DE	\$166.98
6/9/00	K-Mart	Wilmington, DE	\$569.98

6/13/00	Home Depot	Fairless Hills, PA	\$359.34
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All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 2457, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$6,999.04, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
5/15/00	Home Depot	Upper Moreland, PA	\$800.30
5/18/00	Best Buy	Mount Laurel, NJ	\$847.99
5/24/00	Circuit City	Wilmington, DE	\$1349.98
5/24/00	Exxon	Wilmington, DE	\$15.01
5/26/00	Bryn Mawr Stereo	North Wales, PA	\$1377.99
5/30/00	Home Depot	Mount Laurel, NJ	\$833.16
6/2/00	Best Buy	Deptford, NJ	\$1452.18
6/10/00	Exxon	Philadelphia, PA	\$35.85
6/11/00	Target	Burlington, NJ	\$87.64
6/19/00	ESPN Sports Club	Lake Buena Vista, FL	\$20.59

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 4675, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$8,455.37, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
5/15/00	Circuit City	Willow Grove, PA	\$1165.99
5/18/00	Golfsmith Golf Center	Moorestown, NJ	\$805.50
5/22/00	Circuit City	Cherry Hill, NJ	\$1441.58
5/26/00	Circuit City	Montgomeryville, PA	\$1165.99
6/2/00	Circuit City	Deptford, NJ	\$1430.98
6/6/00	Wal Mart	New Castle, DE	\$917.96
6/13/00	K-Mart	Langhorne, PA	\$264.99
6/14/00	Dick's Clothing & Sporting	Mount Holly, NJ	\$423.99
6/16/00	NBA City	Orlando, FL	\$61.07
6/17/00	Panchito's Gifts Sundries	Lake Buena Vista, FL	\$31.82
6/17/00	Coronado Foods	Lake Buena Vista, FL	\$56.00

6/21/00	Men in Black	Orlando, FL	\$15.90
6/29/00	Amoco	New Castle, DE	\$15.01
6/30/00	Mobil	Morton, PA	\$49.01
6/30/00	Comfort Inn	Philadelphia, PA	\$143.66
7/3/00	Amoco	Philadelphia, PA	\$15.01
7/8/00	Sam's Dollar Village	Philadelphia, PA	\$400.00
7/8/00	Sunoco	Philadelphia, PA	\$26.05
7/8/00	Mobil	Philadelphia, PA	\$20.09
7/8/00	Rite Aid Corp.	Philadelphia, PA	\$4.77

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 2249, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$4,482.71, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
5/18/00	Best Buy	Mount Laurel, NJ	\$529.99
5/24/00	Best Buy	Fairless Hills, PA	\$1293.18
5/26/00	Bennigan's	Montgomeryville, PA	\$59.20
6/2/00	Best Buy	Deptford, NJ	\$1293.18
6/9/00	Best Buy	Wilmington, DE	\$899.99
6/13/00	K-Mart	Langhorne, PA	\$392.17
6/14/00	Mobil	Philadelphia, PA	\$15.00

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 4086, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$1,458.48, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
6/3/00	Home Depot	Mount Laurel, NJ	\$839.48
6/17/00	Steam Train Tour	Lake Buena Vista, FL	\$559.68
6/23/00	Mobil	Glenside, PA	\$37.10
6/27/00	Mobil	Philadelphia, PA	\$22.22

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT NINE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 4263, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$4,452.34, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
5/24/00	Dick's Clothing & Sporting	Fairless Hills, PA	\$847.98
6/3/00	Center City Car Wash	Philadelphia, PA	\$20.20
6/4/00	Amoco	Philadelphia, PA	\$22.67
6/6/00	Sunoco	Philadelphia, PA	\$25.57
6/9/00	Mobil	Philadelphia, PA	\$23.00
6/16/00	IOA Admissions	Orlando, FL	\$317.85
6/21/00	NBA City	Orlando, FL	\$3180.00
6/26/00	Mobil	Philadelphia, PA	\$15.07

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 3156, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$3,203.46, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
6/6/00	Golf Augusta of PA	Wilmington, DE	\$899.99
6/14/00	Home Depot	Burlington, NJ	\$728.22
6/26/00	K-Mart	Langhorne, PA	\$423.98
6/30/00	Home Depot	Primos-Secane, PA	\$612.54
6/30/00	Houlihan's	Bala Cynwyd, PA	\$272.11
7/1/00	Amoco	Philadelphia, PA	\$33.76
7/1/00	Mobil	Glenside, PA	\$26.92
7/15/00	Mobil	Philadelphia, PA	\$30.67
7/15/00	Mobil	Philadelphia, PA	\$25.00
7/15/00	Hilton Hotel	Cherry Hill, NJ	\$115.53
7/19/00	Mobil	Philadelphia, PA	\$34.74

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 2270, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$4,455.98, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
6/30/00	Comp USA	Montgomery, PA	\$847.97
7/3/00	Toys R Us	Willow Grove, PA	\$498.17
7/10/00	Best Buy	Willow Grove, PA	\$1518.95
7/14/00	Cherry Hill Fine Wine	Cherry Hill, NJ	\$93.24
7/16/00	Marriott Hotel	Philadelphia, PA	\$58.06
7/18/00	Comp USA	Wilmington, DE	\$799.97
7/20/00	Maverick Restaurant	Harrisburg, PA	\$41.36
7/21/00	Target	Langhorne, PA	\$476.99
7/23/00	Zesty's	Philadelphia, PA	\$84.20
7/28/00	Toys R Us	Wyncote, PA	\$37.07

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES THAT:

1. Paragraphs 1 through 5 and 7 through 10 of Count One are realleged here.
2. On or about the dates listed below, in the Eastern District of Pennsylvania and elsewhere, defendant

TYWANNA CURRIE-MILLER

knowingly and with intent to defraud, aided and abetted the use of an unauthorized access device, that is, a Chase credit card, which bore a number ending in the digits 3465, to obtain goods, services, and other things of value aggregating \$1,000 or more during a one-year period, that is, approximately \$2,552.98, as listed below, thereby affecting interstate commerce:

<u>Date</u>	<u>Merchant</u>	<u>Location</u>	<u>Amount</u>
7/13/00	Circuit City	Montgomeryville, PA	\$1589.99
7/25/00	Bryn Mawr Stereo	Philadelphia, PA	\$962.99

All in violation of Title 18, United States Code, Sections 1029(a)(2) and 2.

NOTICE OF FORFEITURE

1. As a result of the violations of Title 18, United States Code, Sections 1029(b)(2) and 1029(a)(2), as set forth in Counts 1 through 12 of this Indictment, the defendant

TYWANNA CURRIE-MILLER

shall forfeit to the United States of America any and all property, real and personal, involved in such offenses, and any property traceable to such property, including, but not limited to, the sum of \$599,303.69.

2. If any of the property subject to forfeiture, as a result of any act or omission of the defendant:

1. cannot be located upon the exercise of due diligence;
2. has been transferred or sold to, or deposited with, a third party;
3. has been placed beyond the jurisdiction of the Court;
4. has been substantially diminished in value; or
5. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Section 982(b), incorporating 21 U.S.C. § 853(p), to seek forfeiture of any other property of the defendant up to the value of the property subject to forfeiture.

All pursuant to Title 18, United States Code, Section 982.

A TRUE BILL:

FOREPERSON

PATRICK L. MEEHAN
United States Attorney